



Mid-Atlantic, LLC

8301 Professional Place, Suite 230  
Landover, MD 20785

March 28, 2011

Laramie Daniel  
Compliance Program  
Air and Radiation Management Administration  
Maryland Department of the Environment  
1800 Washington Blvd  
Baltimore, MD 21230-1720

And

Paul Arnold  
Office of Enforcement and Permit Review (3AP10)  
US EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: GenOn Morgantown and Dickerson Title V Air Operating Permit 2010 Compliance  
Certifications

Dear Sir or Madam:

GenOn Mid-Atlantic, LLC respectfully submits the Morgantown and Dickerson Generating Station's  
2010 Title V Air Operating Permit Compliance Certifications.

Should you have any questions about these Certifications please feel free to contact me at  
[arnold.solomon@genon.com](mailto:arnold.solomon@genon.com) or 301 955 9159.

Sincerely,

Arnold Solomon

cc: Ralph Hall, MDE  
M. Greger, MDE  
S. Lang, MDE

U.S.ENVIRONMENTAL PROTECTION AGENCY  
APPLICATION FOR FEDERAL OPERATING PERMIT,40 CFR PART 71

**FORM A-COMP -ANNUAL COMPLIANCE CERTIFICATION**

INSTRUCTIONS: There are 3 pages to this form. On this page, complete Sections A and B once with respect to the entire annual compliance certification.

**A.GENERAL INFORMATION****1. Identifying Information.**

Source or company name: Dickerson Generating Station - GenOn Mid-Atlantic, LLC

Mailing address: 21200 Martinsburg Road

City: Dickerson State: MD ZIP: 20842

Contact person: Mr. Peter Heimlicher Title: Environmental Analyst

Telephone: 301 601-6515 Part 70 Permit No: 24-031-00019

**2. Reporting Period:** The reporting period should be the one-year, or shorter period, required by your part 70 permit. It will be assumed that the beginning date begins and ends at Midnight (12 A.M.), unless you specify otherwise.

Period beginning: 01/01/2010. Period ending: 12/31/2010.

**B.CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS**

**1. Responsible Official.** Identify the responsible official and provide contact information.

Name: (Last): Gouveia (First): Mark (Middle):

Title: Vice President, PJM South

Street or Post Office Box: GenOn Morgantown Generating Station, 12620 Crain Highway

City: Newburg State: MD ZIP: 20664

Telephone: 202 580 5611 Facsimile: 925 427 3518

**2.Certification of Truth, Accuracy and Completeness** .The Responsible Official must sign this statement after the form is completed for each applicable requirement.

**I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.**

Name (signed) Mark Gouveia

Name (printed or typed): Mark Gouveia

Date: 3 / 25 / 11

FORM A-COMP (CONTINUED)

INSTRUCTIONS: Use this page to describe the compliance status of each permit term or condition. This page may be used to provide information on 2 different permit terms or conditions. Copy this page as many times as necessary to cover all permit terms and conditions.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 A. <u>Applicable Standards and limits</u> [COMAR 26.11.09.05A(2)] Visible Emissions not greater than 10 % opacity excluding exceptions <u>Monitoring Requirements</u> [COMAR 26.11.01.10] <u>Recordkeeping Requirements</u> [COMAR 26.11.01.10G(2)] <u>Reporting Requirements</u> [COMAR 26.11.01.10G(1) & (2)]	D1, 2, & 3	Continuous Compliance Except for as detailed in Section E

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The COMS produced continuous data, except as provided in TM90-01. The Continuous Opacity Monitors (COMS) have been certified in accordance with 40 CFR 60 App. B and met the quality assurance criteria of TM 90-01, and continuously monitored opacity except as provided in TM 90-01. Records were maintained to meet the requirements of 26.11.01.10G(2). Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 B. <u>Applicable Standards and limits</u> [COMAR 26.11.09.06B(3) & Condition 40, 3/2008 Consent Decree] Control of Particulate matter in excess of 0.03 gr/scfd @ 50% excess air <u>Testing Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.01.04A]	D1, 2, & 3	Continuous Compliance

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FORM A-COMP (CONTINUED)

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Testing, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the particulate matter standard. The test method for this determination produces intermittent data. Particulate matter tests conducted on 3/7-8/2010 & 10/9-10/2010 demonstrate compliance with the particulate matter standard of 0.03 gr/scfd [COMAR 26.11.09.06B(3)]. All tests were conducted using EPA Test Method 5 of 40 CFR 60 App. A.  
Copies of the test reports are filed at the facility. Test reports were submitted within 45 days from test completion.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (1) <u>Applicable Standards and limits</u> [#49352 Amended 7/26/78 Consent Decree] Control of SO <sub>2</sub> : from solid fuel- not > 2.8 lbs./MMBTU-24 hr average <u>Monitoring Requirements</u> [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> [COMAR 26.11.01.10G(2)] <u>Reporting Requirements</u> [COMAR 26.11.01.10G(2)(d)]	D 1, 2 & 3	Continuous Compliance Except for as detailed in Section E

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO<sub>2</sub> standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO<sub>2</sub> Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B.  
Records were maintained to meet the requirements of 26.11.01.10G(2)  
Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (2) <u>Applicable Standards and limits</u> HAA -2010 SO <sub>2</sub> -D1 1616 ton/yr, D2 1770 ton/yr & D3 1678 ton/yr or system wide compliance[COMAR 26.11.27.03C] <u>Monitoring Requirements</u> CEMS[COMAR 26.11.27.05] <u>Recordkeeping Requirements</u> 5 Years[COMAR 26.11.27.05] <u>Reporting Requirements</u> Monthly EDR [COMAR 26.11.27.05]	D 1, 2 & 3	Not Applicable for reporting period Except for as detailed in Section E

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FORM A-COMP (CONTINUED)

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO<sub>2</sub> standards. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO<sub>2</sub> Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B.  
Records were maintained to meet the requirements of 26.11.01.10G(2)  
Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (3) <u>Applicable Standards and limits</u> Acid Rain Phase II[40 CFR 72] <u>Monitoring Requirements</u> CEMS [40 CFR 72 & 75] <u>Recordkeeping Requirements</u> 5 Years [40 CFR 72 & 75] <u>Reporting Requirements</u> Quarterly ERD[40 CFR 72 & 75]	D 1, 2 & 3	Continuous Compliance Except for as detailed in Section E

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO<sub>2</sub> standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO<sub>2</sub> Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR75 Subpart B.  
Records were maintained to meet the requirements of 26.11.01.10G(2) & 40 CFR 75  
Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 C. (4) <u>Applicable Standards and limits</u> CAIR SO <sub>2</sub> allowances caps[40 CFR 96] <u>Monitoring Requirements</u> CEMS[40 CFR 75] <u>Recordkeeping Requirements</u> 5 Years [40 CFR 96] <u>Reporting Requirements</u> Quarterly EDRs[40 CFR 96]	D1, 2 & 3	Continuous Compliance Except for as detailed in Section E

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining Compliance with the SO<sub>2</sub> standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The SO<sub>2</sub> Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 and operated in accordance with 40 CFR 75 Subpart B. Records were maintained to meet the requirements of 26.11.01.10G(2) & 40 CFR 75. Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1 D. (1) <u>Applicable Standards and limits</u> [COMAR 26.11.09.08, 26.11.09.08C, 26.11.09.08B(2)(d)] NO <sub>x</sub> RACT- maximum NO <sub>x</sub> emissions rate of 0.70 lbs./MMBTU heat input <u>Monitoring Requirements</u> [COMAR 26.11.09.08C(3), 26.11.09.08B(2)(b), 26.11.28.07] <u>Recordkeeping Requirements</u> [COMAR 26.11.03.06C] <u>Reporting Requirements</u> [COMAR 26.11.09.08K(1)]	D1, 2 & 3	Continuous Compliance Except for as detailed in Section E

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the NO<sub>x</sub> RACT standard. The CEMS produced continuous data, except as provided in 40 CFR 75. The NO<sub>x</sub> Continuous Emissions Monitors (CEMS) have been certified in accordance with 40 CFR 75 App. A and operated in accordance with 40 CFR 75. Records were maintained to meet the requirements of 26.11.03.06C. Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit.

FORM A-COMP (CONTINUED)

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV 1 D (2).  <u>Applicable Standards and limits</u> HAA [26.11.27.03B] 2010 Annual NOx Limits D1-672 tn/year, D2-736 tn/year, D3-698 tn/year 2010 Ozone NOx Limits D1- 311 tn/year, D2-333 tn/year, D3-314 tn/year or system wide compliance  <u>Monitoring Requirement</u> CEMs 40 CFR 75 [COMAR 26.11.28.09.08C(3)]  <u>Recordkeeping Requirements</u> 5 Year[COMAR 26.11.27]  <u>Reporting Requirements</u> Annual and Ozone Report [COMAR 26.11.27.05]</p>	D1, 2 & 3	Continuous Compliance Except for as noted in Section E

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the HAA. The CEMS produced continuous data, except as provided in 40 CFR 75. The NOx Continuous Emissions Monitors (CEMS) and flow monitor have been certified in accordance with 40 CFR 75 App. A and operated in accordance with 40 CFR 75. NOx emission rate and hourly heat input were determined in accordance with permit conditions. Records were maintained to meet the requirements of COMAR 26.11.29.11 EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported NOx in lbs./hr. for each hour, and tons for each quarter and the control period. An annual and ozone season compliance report was submitted to MDE, PSC and DNR by 3/1/2010.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV 1b.1D  <u>Applicable Standards and limits</u> Annual System Wide Compliance 19,650 tn/year, Ozone Season Compliance Limit- 6150 tons [Condition 53, 57, 58 Potomac River Consent Decree]  <u>Monitoring Requirement</u> CEMs 40 CFR 75 [Condition 69 Potomac River Consent Decree]  <u>Recordkeeping Requirements</u> 5 Years[Condition 131 Potomac River Consent Decree]  <u>Reporting Requirements</u> Quarterly EDR Reporting [Condition 70 Potomac River Consent Decree]</p>	D1, 2 & 3	Continuous Compliance Except for as noted in Section E

#### D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted with CEMS produced continuous data, except as provided in 40 CFR 75.  
The NOx Continuous Emissions Monitors (CEMS) and flow monitor have been certified in accordance with 40 CFR 75 App. A and operated in accordance with 40 CFR 75. NOx emission rate and hourly heat input were determined in accordance with permit conditions.  
Records were maintained to meet the requirements of [Condition 131 Potomac River Consent Decree]  
[Condition 131 Potomac River Consent Decree]  
EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported NOx in lbs./hr. for each hour, and tons for each quarter. 30 day rolling averages were reported to for the control period. An annual and ozone season compliance report submitted to MDE, PSC and DNR.

#### C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during  
reporting period: 2010

<p>Sec.IV 1a.1A4 <b><u>Applicable Standards and limits</u></b> 7/1/09 to 12/31/09 Compliance with visible emission limits in 10% Opacity Limit COMAR 26.11.09.05(2)(2) [Conition-10 3/6/08 Consent Decree] <b><u>Monitoring Requirement</u></b> COMs COMAR 26.11.01.11 [Conition-10 3/6/08 Consent Decree] <b><u>Recordkeeping Requirements</u></b> COMAR 26.11.01.11 [Conition-10 3/6/08 Consent Decree] <b><u>Reporting Requirements</u></b> Quarterly Reporting COMAR 26.11.01.11 [Conition-10 3/6/08 Consent Decree]</p>	<p>D1, 2 &amp; 3</p>	<p>Continuous Compliance</p>
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#### D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The COMS produced continuous data, except as provided in TM90-01  
The Continuous Opacity Monitors (COMS) have been certified in accordance with 40 CFR 60 App. B and met the quality assurance criteria of TM 90-01, and continuously monitored opacity except as provided in TM 90-01.  
Records were maintained to meet the requirements of 26.11.01.10G(2)  
Quarterly reports were submitted not later than 30 days following each calendar quarter, and included all information specified within the permit. COMs are only active on bypass stack.



### C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1A.1 <u><b>Applicable Standards and limits</b></u> Implementation of Interim and Final Compliance Assurance Monitoring [Conition-8 3/6/08 Consent Decree] <u><b>Monitoring Requirement</b></u> COMs COMAR 26.11.01.11 [Conition-10 3/6/08 Consent Decree] <u><b>Recordkeeping Requirements</b></u> COMAR 26.11.01.11 [Conition-10 3/6/08 Consent Decree] <u><b>Reporting Requirements</b></u> Monthly or Quarterly Reporting COMAR 26.11.01.11 [Conitions-10,31 & 32 3/6/08 Consent Decree]	D1, 2 & 3	Continuous Compliance

### D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each **monitoring** method or means you must **specify** whether it **produced** intermittent or continuous data.

Monthly Interim CAM and Quarterly Final CAM summary reports using the COMs were submitted to MDE. D1, 2 & 3 interim CAM plan require reporting at 9% 1-hour average opacity as a indicator range and Monthly reporting. The approved final CAM plan requires reporting for D1,2 & 3 at 9.9% 1-hour average opacity as a indicator range before actions are taken and Quarterly reporting. CAM reporting is only active for when the bypass stack is in operation.

### C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 1a.1A <u><b>Applicable Standards and limits</b></u> Install PM CEMs [Conitions-31,33 34, 24 & 23, 3/6/08 Consent Decree] <u><b>Monitoring Requirement</b></u> PM CEM [Conition-32 3/6/08, Consent Decree] <u><b>Recordkeeping Requirements</b></u> 5 year record keeping [Conition-32 3/6/08 Consent Decree] <u><b>Reporting Requirements</b></u> Quarterly Reporting of 24 hr rolling averages and notification requirements [Conitions-34, 35, & 36, 3/6/08 Consent Decree]	D1, 2 & 3	Continuous Compliance Except as detailed in Section E

### D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each **monitoring** method or means you must **specify** whether it **produced** intermittent or continuous data.

GenOn provided MDE with a plan to install PM CEMs on D1, 2 & 3 FGD stack in accordance EPA PS-11. GenOn installed PM CEMs on D1, 2 & 3 FGD stack and provided MDE with a proposed QA/QC plan. Reporting of 24 hr rolling PM averages began in Sept 2010 and are include in quarterly reports.

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FORM A-COMP (CONTINUED)

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2.1 A. <u>Applicable Standards and limits</u> [COMAR 26.11.09.05A(2)] Visible Emissions not greater than 10 % opacity excluding exceptions <u>Monitoring Requirements</u> Method 9_VEOs_and Monitor hours of operating [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> 5 Years [COMAR 26.11.03.06C] <u>Reporting Requirements</u> Report Incident of Exceedences[COMAR 26.11.03.06C ]	DCT1	Continuous Compliance By VEOs

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The verification of visible emissions specified in the permit produces intermittent data. However, insofar as observations required of the permit satisfy the testing frequency for this parameter, this procedure demonstrates continuous compliance with the opacity standard of COMAR 26.11.09.05A(1)].

As stipulated in Sec. IV 2.3A of the permit, EPA Method 9 observations shall be performed once every 168 hours of operation if greater 100 hr of operation. In 2010 DCT1 operated for 36 hrs less than 100hrs of operations required for VEO observations.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2 C. <u>Applicable Standards and limits</u> [COMAR 26.11.09.07A(1)] Control of SO2: from distillate oil- not >0.3% sulfur <u>Monitoring Requirements</u> Fuel Supplier Certification[COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> 5 Years[COMAR 26.11.03.06C] <u>Reporting Requirements</u> If requested by MDE [COMAR 26.11.01.06C]	DCT1	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the SO2 standard. Fuel sulfur data from each shipment of fuel oil provides intermittent data, however, these data indicate continuous compliance.

Fuel supplier certification was obtained demonstrating compliance with the fuel sulfur limitation.

Records are retained at the facility for the required five years.

Fuel certification was provided to the MDE inspector as requested.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 2.1C. <u><b>Applicable Standards and limits</b></u> [COMAR 26.11.09.08G] NOx RACT- provide certification to Department of capacity factors, as defined in 40 CFR 72.2, to be <15%; record hours of operation. <u><b>Monitoring Requirements</b></u> Combustion Analysis [COMAR 26.11.09.08G(1)(b)] <u><b>Recordkeeping Requirements</b></u> 5 Year [COMAR 26.11.09.08G(1)(c), 26.11.03.06C] <u><b>Reporting Requirements</b></u> Annual Emission Statements[COMAR 26.11.09.08G(1)(a), 26.11.03.06C ]	DCT1	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Record-keeping, and monitoring were conducted in accordance with permit conditions for determining compliance with the NOx RACT standard. Cap. Factor and Hours of Operation reported in annual emission statement.  
 Capacity Factors for 2010 for DCT1 – 0.37%  
 Hours of operation for 2010 for: DCT1 – 37 hr

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV-3.1A <u><b>Applicable Standards and limits</b></u> Less than 10% opacity [COMAR 26.11.09.05A(2)] <u><b>Monitoring Requirements</b></u> Method 9 VEOs and Monitor hours of oil operating [COMAR 26.11.03.06C] <u><b>Recordkeeping Requirements</b></u> 5 Years [COMAR 26.11.03.06C] <u><b>Reporting Requirements</b></u> Report Incident of Exceedences[COMAR 26.11.03.06C ]	D-HCT1, D-HCT2	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the opacity standard. The verification of visible emissions specified in the permit produces intermittent data. However, insofar as observations required of the permit satisfy the testing frequency for this parameter, this procedure demonstrates continuous compliance with the opacity standard of COMAR 26.11.09.05A(2)].  
 As stipulated in Sec. IV 2.3A of the permit, EPA Method 9 observations shall be performed once every 168 hours of operation if greater 100 hr of operation. No exceedances of the 10% opacity standard were observed, hence no reporting per Permit Condition 4, Section III was required

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV-3.1B</p> <p><b>Applicable Standards and limits</b> Sulfur in oil no more than 0.3%, SO2 Emissions limited to 34 lb/hr-gas firing, 576 lb/hr-oil firing and 1249 tons consecutive 12 month period [CPCN 8063 Conditions 17, 18 and 27]. Sulfur in oil no more than 0.8%, [NSPS 40 CFR 60.333]</p> <p><b>Monitoring Requirements</b> Analysis of Sulfur Content of Fuel [CPCN 8063 Condition 16, 40 CFR 60.334]</p> <p><b>Recordkeeping Requirements</b> 5 Years [CPCN 8063 Condition 16, 40 CFR 60.7(f)]</p> <p><b>Reporting Requirements</b> Quarterly reports submitted to MDE and notifications to PSC [CPCN 8063 Condition 28, 40 CFR 60.334(j)]</p>	<p>D-HCT1</p> <p>D-HCT2</p>	<p>Continuous Compliance</p>

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Sulfur content of fuels determined using methods in 40 CFR 60.334 [ASTM]. Emission rates determined using PEMs [40 CFR 75 Appendix D]. Emission reported in quarterly EDRs and annual emission statements.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p>Sec.IV 3.1.B Acid Rain &amp; CAIR Permit</p> <p><b>Applicable Standards and limits</b> Hold SO2 allowances sufficient to cover SO2 emissions for year [40 CFR 72, &amp; 96].</p> <p><b>Monitoring Requirements</b> [40 CFR 75 Subpart B and App. C ]</p> <p><b>Recordkeeping Requirements</b> [40 CFR 96 Subpart HH &amp; HHHH ]</p> <p><b>Reporting Requirements</b> [40 CFR 75 Subpart G ]</p>	<p>D-HCT1</p> <p>D-HCT2</p>	<p>Continuous Compliance</p>

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the Acid Rain & CAIR Programs. SOx emission rate and hourly heat input were determined in accordance 40CFR96 .

Records were maintained to meet the requirements of 40 CFR 96 Subpart HH & HHHH

EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported SOx in lbs./hr. for each hour, and tons for each quarter and the control period. An annual compliance certification was submitted to MDE & EPA prior to the allowance transfer deadline.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1 C. <u><b>Applicable Standards and limits</b></u> CO emissions limited to Gas Firing 90 lb/hr, Oil Firing 91 lb/hr and 263 tons per 12 months period. [CPCN 8063 Conditions 17 & 18] <u><b>Monitoring Requirements</b></u> Preventative Maintenance Reports [COMAR 26.11.03.06C] <u><b>Recordkeeping Requirements</b></u> 5 years [COMAR 26.11.03.06C] <u><b>Reporting Requirements</b></u> Upon Request [COMAR 26.11.03.06C]	D-HCT1 D-HCT2	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Maintenance records are kept up to date and annual emissions are reported on annual emission statements

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1 D. <u><b>Applicable Standards and limits</b></u> VOC emissions limited to Gas Firing 2 lb/hr, Oil Firing 4 lb/hr and 9.2 tons per 12 months period. [CPCN 8063 Conditions 17 & 18] <u><b>Monitoring Requirements</b></u> Preventative Maintenance Reports [COMAR 26.11.03.06C] <u><b>Recordkeeping Requirements</b></u> 5 years [COMAR 26.11.03.06C] <u><b>Reporting Requirements</b></u> Upon Request [COMAR 26.11.03.06C]	D-HCT1 D-HCT2	Continuous Compliance

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FORM A-COMP (CONTINUED)

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Maintenance records are keep up to date and annual emissions are reported on annual emission statements

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during  
reporting period: 2010

Sec.IV 3.1 E. <u>Applicable Standards and limits</u> PM & PM10 emissions limited to Gas Firing 21 lb/hr, Oil Firing 27 lb/hr and 60 tons per 12 months period. [CPCN 8063 Conditions 17 & 18] <u>Monitoring Requirements</u> Preventative Maintenance Reports [COMAR 26.11.03.06C] <u>Recordkeeping Requirements</u> 5 years [COMAR 26.11.03.06C] <u>Reporting Requirements</u> Upon Request [COMAR 26.11.03.06C]	D-HCT1 D-HCT2	Continuous Compliance
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**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Maintenance records are keep up to date and annual emissions are reported on annual emission statements

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FORM A-COMP (CONTINUED)

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1 F. <u><b>Applicable Standards and limits</b></u> Operational Limits-Units shall burn gas unless gas is not available or price difference >15% [CPCN 8063 Condition 13] <u><b>Monitoring Requirements</b></u> Letter from supplier identifying gas service restriction <u><b>Recordkeeping Requirements</b></u> 5 years [COMAR 26.11.03.06C] <u><b>Reporting Requirements</b></u> Letter from supplier identifying gas service restriction included in 4 <sup>th</sup> Quarter Reports.	D-HCT1 D-HCT2	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Letter from supplier identifying gas service restrictions included in 4<sup>th</sup> Quarter Reports submitted to MDE.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1a G. 1 <u><b>Applicable Standards and limits</b></u> [COMAR 26.11.09.08G] NOx RACT- provide certification to Department of capacity factors, as defined in 40 CFR 72.2, to be <15%; record hours of operation. <u><b>Monitoring Requirements</b></u> Combustion Analysis [COMAR 26.11.09.08G(1)(b)] <u><b>Recordkeeping Requirements</b></u> 5 Year [COMAR 26.11.09.08G(1)(c), 26.11.03.06C] <u><b>Reporting Requirements</b></u> Annual Emission Statements [COMAR 26.11.09.08G(1)(a), 26.11.03.06C ]	D-HCT1 D-HCT2	Continuous Compliance

#### D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Record-keeping, and monitoring were conducted in accordance with permit conditions for determining compliance with the NOx RACT standard. Cap. Factor and Hours of Operation reported in annual emission statement.  
Capacity Factors for 2010 for HCT1 – 2.88%, HCT2 – 4.23%  
Hours of operation for 2010 for: HCT1 – 434 hrs, HCT2 – 600 hrs

#### C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during  
reporting period: 2010

<p>Sec.IV 3.1a G.2</p> <p><b>Applicable Standards and limits</b> NOx Gas Firing 42 ppmvd, 321 lb/hr, Oil Firing 57 (for N&lt;0.015 ) or 57+400N (for N.0.015) N=% nitrogen content of fuel, 608 lb/hr, and 1311 tn per 12 month. [CPCN 8063 Conditions 15, 17 &amp; 18]</p> <p><b>Monitoring Requirements</b> Monitoring of water to fuel ratios [40 CFR 60.334] [CPCN 8063 Condition 16]</p> <p><b>Recordkeeping Requirements</b> 2 Year &amp; 5 Year[CPCN 8063 Condition 28] [COMAR 26.11.09.08G(1)(c), 26.11.03.06C]</p> <p><b>Reporting Requirement</b> Quarterly Reporting [CPCN 8063 Condition 28]</p>	<p>D-HCT1 D-HCT2</p>	<p>Continuous Compliance</p>
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#### D.METHODS USED TO DETERMINE COMPLIANCE

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Quarterly reports submitted to MDE provided all required NOx emission date.



**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
Sec.IV 3.1a G.3 <u><b>Applicable Standards and limits</b></u> NSPS NOx STD (ppvd)= $(0.0075 \times (14.4/Y)) + F(\text{fuel bound nitrogen})$ [40CFR60.332] <u><b>Monitoring Requirements</b></u> Monitoring of water to fuel ratios [40 CFR 60.334] <u><b>Recordkeeping Requirements</b></u> Maintain all monitoring data [40 CFR 60.7(f)] <u><b>Reporting Requirement</b></u> Quarterly Reporting [40 CFR 60.334]	D-HCT1 D-HCT2	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Quarterly reports submitted to MDE provided all required NOx emission data.
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Sec.IV 3.1a G.4 & 5 <u><b>Applicable Standards and limits</b></u> CAIR NOx allowances [40 CFR 75 subpart G][40 CFR 96] <u><b>Monitoring Requirements</b></u> PEMs [40 CFR 75 subparts B & E] <u><b>Recordkeeping Requirements</b></u> 5 Years [40 CFR 96 subparts HH & HHHH] <u><b>Reporting Requirements</b></u> Quarterly EDRs [40 CFR 96 subparts HH & HHHH][40 CFR 75 subpart G]	D-HCT1 D-HCT2	Continuous Compliance
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**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring, record-keeping, and reporting were conducted in accordance with permit conditions for determining compliance with the Acid Rain & CAIR Programs. NO2 emission rate and hourly heat input were determined in accordance 40CFR96 . Records were maintained to meet the requirements of 40 CFR 96 Subpart HH & HHHH EDRs were submitted to the NATS Administrator not later than 30 days following each calendar quarter, and reported NOx in lbs./hr. for each hour, and tons for each quarter and the control period. An annual compliance certification was submitted to MDE & EPA prior to the allowance transfer deadline.
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**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)

Unit ID(s):

Compliance status during  
reporting period: 2010

Sec.IV 4.1 <u><b>Applicable Standards and limits</b></u> PM emissions from Material Handling- Reasonable Precautions to be Taken [COMAR 26.11.06.03C(1) & .03D <u><b>Monitoring Requirements</b></u> BMPs [COMAR 26.11.03.06C] <u><b>Recordkeeping Requirements</b></u> 5 Years [COMAR 26.11.03.06C] <u><b>Reporting Requirement</b></u> NA	Ash and Coal Handling	Continuous Compliance
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**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.

For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monthly BMP Conducted
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**FORM A-COMP (CONTINUED)**

**Section VI STATE ONLY ENFORCEABLE CONDITIONS**

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<u>Applicable Standards and limits</u> Nuisance & Odors[COMAR 26.11.06.08 & 26.11.06.08] <u>Monitoring Requirements</u> [COMAR 26.11.09.10B] <u>Recordkeeping Requirements</u> [COMAR 26.11.09.10] <u>Reporting Requirements</u> [COMAR 26.11.09.10]	Facility Wide	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

.Good manage ment practices used to avoid Nuisances or Odors crossing property boundaries.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<u>Alternative Operating Scenario for D1, 2 &amp; 3</u>  <u>Applicable Standards and limits</u> [COMAR 26.11.09.10] Requirements to burn used oil and waste combustible fluid as fuel. <u>Monitoring Requirements</u> [COMAR 26.11.09.10B] <u>Recordkeeping Requirements</u> [COMAR 26.11.09.10] <u>Reporting Requirements</u> [COMAR 26.11.09.10]	D1, 2 & 3	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C.  
 For each monitoring method or means you must specify whether it produced intermittent or continuous data.

Monitoring and record-keeping reporting were conducted in accordance with permit conditions for determining compliance with used oil combustion requirements.  
 7500 gallons of on spec. oil was burned in 2010.  
 No boiler cleaning waste was burned in Year 2010.  
 Records are retained at the facility for the required five years.

**C.COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION**

Identify (Describe and Cross-reference the Permit Term or Condition)	Unit ID(s):	Compliance status during reporting period: 2010
<p><b><u>Healthy Air Act Requirements- Hg Reductions Requirements</u></b></p> <p><b><u>Applicable Standards and limits</u></b> In 2010 80% Hg reduction 12month rolling average [COMAR 26.11.27.03D]</p> <p><b><u>Monitoring Requirements</u></b> Baseline Hg Stack Testing and Hg CEMs [40 CFR 72, COMAR 26.11.27.04 &amp; .05]</p> <p><b><u>Recordkeeping Requirements</u></b></p> <p><b><u>Reporting Requirements</u></b> Notification of Hg compliance Option by 1/1/2010, with Annual Report (by 3/1) to MDE, DNR &amp; PSC</p>	D1, 2 & 3	Continuous Compliance

**D.METHODS USED TO DETERMINE COMPLIANCE**

Describe all methods or means you used to determine compliance with the permit term and condition described in section C. For each **monitoring** method or means you must **specify** whether it **produced** intermittent or continuous data.

<p>Baseline Hg stack testing completed and Data submitted to MDE. Compliance option provided to MDE. Hg CEMs installed, operating and certified. Hg emission data provide to MDE in quarterly monitoring reports and annual report.</p>
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FORM A-COMP (CONTINUED)

E. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

The table below is appropriate for reporting deviations from permit terms or conditions that have been previously reported in a six-month monitoring report (assuming that the most recent six-month monitoring report and the annual compliance certification both end on the same date). Copy this page as many times as necessary to include all such deviations. Note that you may cross-reference deviations already reported in the six-month report in the first column of the table, and leave the other columns blank, however such cross-reference must be clear and unambiguous with respect to the six-month monitoring report and the individual deviation being cross-referenced. In addition, in the first column, whether you cross-reference deviations or not, you must indicate whether each deviation is a "possible exceptions" to compliance." If a deviation is not a possible exception to compliance, please briefly explain why it is allowed by the permit and cite the relevant permit term that provides the excuse. In addition, if there are deviations that have never been reported in writing to the permitting authority, more information than required by this table will be needed. In such cases, you must include information consistent with Section D of the six-month monitoring report form, and indicate whether it is a "possible exception to compliance."

Permit Term for Which There is a Deviation & Whether the Deviation is a "Possible Exception to Compliance"	Emission Units (unit IDs)	Deviation Time Periods			Written Deviation Report Submittal Date (mo/dy/year)
		Date (mo/day/yr)	Time (hr/min)	Time Zone	
Sec. IV-1C (1),(2),(3),(4). & D. (1),(2) Monitoring Requirements C & D Monitoring Requirements must meet 40 CFR 75. Regulation requires 12 point stratification test prior to conducting single point sampling. Test contractor used a 3 point stratification test instead of full 12 point test prior to single point sampling	D-1, 2, & 3	Units 1, 2 and 3 – 3 Point Stratification Test Conducted on 1/19/2010			10/23/2010
		Units 1, 2 and 3 – 12 Point Stratification Test Conducted on 12/16/2010			
Sec IV 1 A, New Opacity Regulations [Requirements not included in current Title V Permit] COMAR 26.11.09.05A. b. (iii) On any calendar day, do not exceed the applicable emission limitation (10% opacity) for more than 4.1 hours	D-1, 2, & 3	8/28/2010 for various times periods for total time of 4.2 hours			10/31/2010/
Sec.IV 1 a 1A. Condition 37 & 52, 3/2008 Consent Decree Failure to submit the required reports within 180 days from initial PM CEM start-up describing the reliability and accuracy of the Particulate CEM by date required.	D-1, 2, & 3	8/25/2010			NA

**GenOn Mid-Atlantic, LLC - Dickerson Generating Station Title V  
2010 CERTIFICATION OF PLANT-WIDE CONDITIONS**

(SECTIONS II & III OF PART 70 **Dickerson Generation Station OPERATING PERMIT**)  
Indicate compliance with the following requirements of Sections II & III of your Part 70 Operating Permit in the space provided below:

**Section II:**

1. Definitions (N/A)

[COMAR 26.11.01.01 & 26.11.02.01-26]

2. Acronyms (N/A)

3. Effective Date (N/A)

4. Permit Expiration

[COMAR 26.11.03.13B(2)]

Received Part 70 Permit on 4/1/2009, Permit is current and active. Permit expiration date - 10/31/2013  
Compliance Status: Continuous Compliance

5. Permit Renewal

[COMAR 26.11.03.02B(3) & 26.11.03.02E]

Received Part 70 Permit on 4/1/2009, Permit is current and active.  
Compliance Status: Continuous Compliance

6. Confidential Information (N/A)

[COMAR 26.11.02.02G]

7. Permit Actions (N/A)

[COMAR 26.11.03.06E(3) & 26.11.03.20A]

8. Permit Availability

[COMAR 26.11.02.13G]

A copy of the Permit is on-site and available for inspection.  
Compliance Status: Continuous Compliance

9. Reopening of the Part 70 Permit for Cause by the EPA

[COMAR 26.11.03.20B]

There has been no action by EPA to reopen the Permit.  
Compliance Status: Continuous Compliance

10. Transfer of Permit

[COMAR 26.11.02.02E]

Transfer of the permit has not been requested.  
Compliance Status: Continuous Compliance

11. Revision of Part 70 Permits-General Condition (NA)

[COMAR 26.11.03.06A(8) & 26.11.03.14]

No revisions to the existing permit were requested in 2010.  
Compliance Status: Continuous Compliance

12. Significant Part 70 Operating Permit Modifications (NA)

[COMAR 26.11.03.17]

Part 70 Permit Application for a Significant Modifications was submitted to MDE and EPA on 1/21/2010 that included the air operating conditions found in the CPCNs for the Dickerson SO<sub>2</sub> FGD system (MD PSC Case 9097) and SNCR System (MD PSC Case 9140).

Compliance Status: Continuous Compliance

13. Minor Permit Modifications (N/A)

[COMAR 26.11.03.16]

14. Administrative Part 70 Operating Permit Amendments

[COMAR 26.11.03.15]

On 12/3/2010 RRI Energy, Inc. and Mirant Corporation completed a merger to form GenOn Energy, Inc. On 12/15/2010 GenOn notified MDE that owner and operator on the Dickerson Generating Station is GenOn Mid-Atlantic, LLC

Compliance Status: Continuous Compliance

15. Off-Permit Changes to this Source (N/A)

[COMAR 26.11.03.19]

16. On-Permit Changes to Sources (N/A)

[COMAR 26.11.03.18]

17. Fee Payment

[COMAR 26.11.02.16A(2)&(5)(b)]

The Dickerson Permit Fee was paid in 2010.

Compliance Status: Continuous Compliance

18. Requirements for Permits to Construct and Approvals

[COMAR 26.11.02.09]

No new construct permitting activities took place in 2010.

Compliance Status: Continuous Compliance

19. Consolidation of Procedures for Public Participation (N/A)

[COMAR 26.11.02.11C & 26.11.03.01K]

20. Property Rights (N/A)

[COMAR 26.11.03.06E(4)]

21. Severability (N/A)

[COMAR 26.11.03.06A(5)]

22. Inspection and Entry

[COMAR 26.11.03.06G(3)]

All Department, Federal and Local personnel have been provided the right of entry and excess to all onsite facilities and activates.

Compliance Status: Continuous Compliance

23. Duty to Provide Information

[COMAR 26.11.03.06E(5)]

GenOn has provided all information required and request by MDE & EPA for Dickerson Station in compliance year 2010.

Compliance Status: Continuous Compliance

24. Compliance Requirement

[COMAR 26.11.03.06E(1), 26.11.03.06A(11) & 26.11.02.05]

Dickerson is compliant with all applicable requirements except for those exceptions noted in Sec. IV E.

Compliance Status: Intermittent Compliance

25. Credible Evidence (N/A)

26. Need to Halt or Reduce Activity Not A Defense (N/A)

[COMAR 26.11.03.06E(2)]

27. Circumvention (N/A)

[COMAR 26.11.01.06]

28. Permit Shield

[COMAR 26.11.03.02]

Compliance Status: Continuous Compliance

29. Alternate Operating Scenarios

[COMAR 26.11.03.06A(9)]

Dickerson burned on-spec. 7,500 gallons of used oil in Units 1, 2 or 3.

Compliance Status: Continuous Compliance

**Section III:**

1. Particulate Matter from Construction and Demolition

[COMAR 26.11.06.03D]

Reasonable precautions were taken during all construction or demolition activity occurred during the reporting period of this certification.

Compliance Status: Continuous Compliance

2. Open Burning

[COMAR 26.11.07.06]

No open burning occurred on site in 2010.

3. Air Pollution Episode (N/A)

[COMAR 26.11.05.04]

4. Report of Excess Emissions and Deviations

[COMAR 26.11.01.07 & COMAR 26.11.03.06C(7)]

No exceedances or deviations of emission limits other than opacity limits. All opacity exceedances are reported in CEM reports submitted quarterly to MDE.

Dickerson is compliant with all applicable requirements except for those exceptions noted in Sec. IV E.

Compliance Status: Continuous Compliance

5. Accidental Release Provisions (if applicable)

[COMAR 26.11.03.03B(23) & 40 CFR 68]

Administrative controls have been established which limit the amount of regulated substance on site to below threshold quantities; thus, in accordance with 40 CFR 68.10(a) and 40 CFR 68.115, a Risk

Management Plan is not required for this facility.

Compliance Status: Continuous Compliance

6. General Testing Requirements

[COMAR 26.11.01.04]

Any tests that the Department required in 2010 were performed.

Compliance Status: Continuous Compliance



7. Emissions Test Methods

**[COMAR 26.11.01.04]**

All emissions tests were conducted in accordance with 40 CFR 60 App. A, 40 CFR 51 App M, and/or TM 91-01.

Compliance Status: Continuous Compliance

8. Emission Certification Report

**[COMAR 26.11.02.19C, COMAR 26.11.02.19D, COMAR 26.11.01.05-1]**

A 2010 annual emissions certification report were certified, submitted and records maintained.

Compliance Status: Continuous Compliance

9. Compliance Certification Report

**[COMAR 26.11.03.06C(6) & (7)]**

A 2010 Compliance Certification Report was prepared and was submitted to MDE and EPA.

Compliance Status: Continuous Compliance

10. Certification by Responsible Official

**[COMAR 26.11.02.02F]**

A Compliance Certification Report has been signed by the responsible official, Mark Gouveia, Vice President, PJM South.

Compliance Status: Continuous Compliance

11. Sampling and Emissions Testing Record Keeping

**[COMAR 26.11.03.06C(5)]**

All appropriate records were gathered and retained for compliance demonstration sampling and testing.

Compliance Status: Continuous Compliance

12. General Record Keeping

**[COMAR 26.11.03.06C(5)]**

Records are being retained for five years.

Compliance Status: Continuous Compliance

13. General Conformity (N/A except for federal facilities)

14. Asbestos Provisions (if applicable)

**[40 CFR 61, App. M]**

GenOn contracts with Versa Tech to carry out all asbestos removal and disposal.

Compliance Status: Continuous Compliance

15. Ozone Depleting Regulations (if applicable)

**[40 CFR 82, App. F]**

GenOn contracts with Paramount to carry out all CFC maintenance, service repair or disposal.

Compliance Status: Continuous Compliance

16. Acid Rain Permit (if applicable)

**[40 CFR 72]**

The facility was in compliance with all provisions of the Phase II Acid Rain Permit (Permit No.1572). All compliance certifications and EDRs were submitted to the State and EPA. Allowances were placed in the accounts to cover SO<sub>2</sub> emissions and affected achieve compliance with NO<sub>x</sub> emission limit.

Compliance Status: Continuous Compliance

24-031-00019

Mirant Mid-Atlantic, LLC  
8301 Professional Place Suite 230, Landover, MD 20785



August 10, 2010

Ms. Judith Katz  
Mail Code 3AP00  
Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re.: Particulate Test Report for Dust Collectors on new FGD (scrubber) Installation

Dear Ms. Katz,

Mirant Mid-Atlantic, LLC (Dickerson Generating Station) is providing the test results report for particulates performed on the new dust collectors on the limestone handling system associated with the new FGD (scrubber) installation. Testing was conducted per the requirements under NSPS 40 CFR Part 60, Subpart OOO-Standards of Performance for Non-metallic Mineral Processing Plants. This report has been previously provided to Maryland Department of Environment electronically.

If you have any questions regarding this matter please contact Dave Matthews (240) 299-2104, Senior CEM IT Analyst.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Sincerely,

A handwritten signature in dark ink, appearing to read "WLS".

Walter Stone  
Vice President, Environment

cc: Mr. Richard Killian, Environmental Protection Agency, Region 3  
cc: Mr. Ralph Hall, Maryland Department of Environment